

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RICK MULA
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Rick_Mula@fd.org
6 Attorney for Alberto Lara Caldera, Jr.
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 ALBERTO LARA CALDERA, JR.,
15 Defendant.

Case No. 2:21-cr-00227-JAD-EJY

**STIPULATION TO MODIFY
TEMPORARY RELEASE ORDER**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, and Kimberly Frayn, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Rick Mula,
19 Assistant Federal Public Defender, counsel for Alberto Lara Caldera, Jr., that Mr. Caldera's
20 self-surrender, currently set for Monday, January 29, 2024, by noon be continued to Friday,
21 February 2, 2024, by noon.

22 This Stipulation is entered into for the following reasons:

- 23 1. Magistrate Judge Youchah ordered that Mr. Caldera be temporarily released
24 from custody under 18 U.S.C. § 3142(i)(4) for three different time periods to
25 accommodate medical care. (ECF No. 75.)
26

2. The first of those release periods (January 18, 2024, through January 22, 2024) has lapsed.

3. The second release period is scheduled to end by noon on January 29, 2024.¹ (See ECF No. 76 (adopting Magistrate Judge Youchah's order and modifying it to reflect the current temporary release period from January 25th through January 29th be extended to the morning of January 24th through January 29th).)

4. Mr. Caldera is scheduled to undergo surgery on Friday, January 26, 2024.

5. The post-surgical recovery period will extend beyond January 29, 2024 (the current date by which Mr. Caldera is ordered to self-surrender).

6. The parties believe that Mr. Caldera will be sufficiently recovered by February 2, 2024, to self-surrender.

Accordingly, the parties jointly request that the Court extend Mr. Caldera's self-surrender date (currently set for Monday, January 29, 2024, by noon) to Friday, February 2, 2024, by noon.

DATED this 26th day of January, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Rick Mula

RICK MULA
Assistant Federal Public Defender

By /s/ Kimberly Frayn

KIMBERLY FRAYN
Assistant United States Attorney

¹ The third release period is scheduled for February 14, 2024, through February 16, 2024. (ECF No. 75 at 2.)

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,
5 v.
6 ALBERTO LARA CALDERA, JR.,
7 Defendant.
8

Case No. 2:21-cr-00227-JAD-EJY

ORDER

9
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the self-surrender date currently scheduled for
12 Monday, January 29, 2024, by noon be extended to Friday, February 2, 2024, by noon.

13 IT IS FURTHER ORDERED that the order providing for temporary release on
14 February 14, 2024, and self-surrender no later than noon on February 16, 2024 (ECF No. 75),
15 remains unchanged in all other respects.

16 DATED this 29th day of January, 2024.

17
18 
19 UNITED STATES DISTRICT JUDGE
20
21
22
23
24
25
26